

**Comments on Proposed Design Deliverable Schedule,  
Gasco / Siltronic Sediments Site, Portland Harbor Superfund Site  
Comments dated April 28, 2017**

The following are the U.S. Environmental Protection Agency's (EPA's) comments on the proposed updated schedule of project deliverables received separately from NW Natural and Siltronic Corporation on April 17, 2017. The EPA desires to update Table 1 – Schedule of Project Deliverables in the 2009 Statement of Work associated with the Administrative Settlement Agreement and Order on Consent for Removal Action (AOC) for the Gasco Sediments Site to reflect the status of the Portland Harbor Site relative to the January 2017 Record of Decision.

**General Comments**

1. EPA requests the next version of the Table 1 revision consist of a single schedule representing a collaboration between NW Natural and Siltronic Corporation on any technical issues and timing issues as respondents to the AOC. Please deliver one version of the revised Table 1.
2. Due to the compressed schedule to complete the design for the Gasco /Siltronic Sediments Site, EPA requests that any evaluations contemplated under the Siltronic Implementability Study be incorporated into the Pre-Remedial Design Technical Evaluations and Basis for Design Work Plan for evaluation under the Sediment Remedy Technical Evaluation and Basis for Design Memoranda.
3. EPA notes the schedule proposed by both parties have the last deliverable (Final Design Report) finalized at the earliest in mid-2019. The delivery time presented in Table 1 should be modified so that the Final Design Report is finalized by January 31, 2019, including EPA review time. The EPA believes the revised schedule will position the Gasco /Siltronic Sediments Site for remedy implementation in the appropriate timeframe given its priority status as an Early Action cleanup area.
4. Performing Parties will be expected to incorporate the minimum sampling and design requirements currently under development by EPA as their more detailed sampling plans (e.g. SAPs and QAPPs) and design work plans are developed including Basis for Design Work Plans, Design Technical Evaluations, and Data Gaps Sampling Work Plans. Additional data collection efforts and evaluations should be proposed to reflect the site-specific aspects of the proposed remedy offshore of the Gasco and Siltronic facilities.
5. EPA acknowledges Siltronic Corporation's desire to implement a remedy that addresses site specific implementability issues associated with the Siltronic facility, maximize efficiency and expedite a process to develop the necessary additional Pre-Remedial Design information to fill data gaps they believe exist in the applicable remedial action areas pertaining to the existing AOC. Accordingly, EPA recommends Siltronic work with NW Natural to expeditiously develop a Pre-Remedial Design investigation SAP/QAPP and implement an investigation that reflects site specific implementability concerns, addresses identified data gaps and informs the remedial design.